



United States Government

**NATIONAL LABOR RELATIONS BOARD**

Region 22

20 Washington Place - 5th Floor

Newark, NJ 07102-3110

February 14, 2019

Roxanne Rothschild, Executive Secretary  
National Labor Relations Board  
1015 Half Street SE  
Washington, DC 20570

Re: Arbah Hotel Corporation d/b/a Meadow Lands View Hotel  
Cases 22-CA-197658; 22-CA22-CA-203130;  
22-CA-205317; 22-CA-205422; 22-CA-209158; and  
22-CA-212705

Dear Ms. Rothschild:

Counsel for the General Counsel respectfully opposes Respondent's request for a 60-day extension of time to file its exceptions to the Administrative Law Judge's Decision (ALJD) in the above-captioned cases. Currently exceptions are due on February 15, 2019 and Respondent is requesting an extension until April 16, 2019.

Respondent previously requested a 60-day extension of time to file its exceptions to the ALJD and was granted a generous 30-day extension until February 15, 2019. Now, only 3 days prior to the February 15 due date, Respondent informs the parties that it has hired new counsel and requires an additional lengthy extension on that basis. Pursuant to the Board's Rules and Regulations, Section 102.2 (c), "...[r]equests for extensions of time filed within 3 days of the due date must be grounded upon circumstances not reasonably foreseeable in advance." Respondent has not raised any such circumstances warranting the granting of its 60 day extension request.

However, in the interest of professional courtesy, Counsel for the General Counsel, while opposing Respondent's request for 60 additional days, will agree to an extension of time not to exceed March 22, 2019. Additionally, Counsel for the General Counsel will oppose any further requests for extensions of time by Respondent.

Based on the foregoing, it is respectfully requested that Respondent's Request for a 60-day extension of time to file its exceptions to the ALJD, be denied.

Respectfully Submitted,

/s/ *Chevella Brown-Maynor*

Chevella Brown-Maynor,  
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